



## Office of the Special Narcotics Prosecutor for the City of New York

Bridget G. Brennan, Special Narcotics Prosecutor

80 Centre Street, Sixth Floor, New York, NY 10013

Phone: 212-815-0400 Fax: 212-815-0440

February 23, 2021

### **BY ELECTRONIC DISCOVERY**



Re: People v. [REDACTED] (Indictment No. [REDACTED])

Dear Counsel:

This disclosure letter concerns UNDERCOVER 343, Shield # 00343 of the New York City Police Department ("the Department"), presently assigned to Narcotics Borough Brooklyn South, whom the People intend to call as a witness in this case. In addition to the information below, police disciplinary information exists in various formats online, including in a database located at:

<https://www.nyclu.org/en/campaigns/Nypd-misconduct-database>. Information concerning UNDERCOVER 343 may or may not be included in this database, and the People are unable to verify the database's general accuracy.

UNDERCOVER 343 currently has no pending or substantiated allegations against him/her.

Pursuant to People v. Garrett, 23 N.Y.3d 878 (2014), the People are disclosing the following list of civil lawsuits in which UNDERCOVER 343 has been named in his/her capacity as a member of law enforcement.

The People identified the lawsuits listed below primarily using public databases and information, including a list of lawsuits alleging misconduct by the NYPD and its individual officers which is published every six months on the New York City Law Department's web site, available at <https://www1.nyc.gov/site/law/public-resources/nyc-administrative-code-7-114.page>. Publicly-available litigation materials related to these lawsuits are also being provided, to the extent the materials currently are in the People's possession.

CASE NAME: PERRY, CARLYLE VS CITY OF NEW YORK, ET AL.

CASE NUMBER: 525781/2019; COURT: SUPREME COURT - KINGS; LITIGATION START DATE: MON DEC 09 2019

Allegations of misconduct that have not been substantiated and are not pending (including, but not limited to, findings of unsubstantiated, unfounded, and exonerated) are not subject to disclosure and generally are not included in this letter. Additionally, the decision to include information in this letter does not represent a conclusion by the People that all the information contained herein is required to be disclosed under the People's constitutional, ethical or statutory obligations. The People reserve the right to

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move in limine to preclude or limit reference to the information in this letter in any further proceedings in this prosecution.

If you have any questions, feel free to contact me at (212) 815-0155.

Sincerely,

*David S. Torreblanca*

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David S. Torreblanca  
Assistant District Attorney